

20-CV-3755

KOMITEE, J.  
BULSARA, M.J.UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORKChristopher Ransom

Plaintiff,

[Insert full name of plaintiff/prisoner]

-against-

Sgt Mathew GormanSgt Noorallah MashrieOfficer Jessica TorrezOfficer Daniel OliverOfficer Giuseppe Divanna

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

- I. **Parties:** (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Christopher Ransom

If you are incarcerated, provide the name of the facility and address:

125 White Street, NY, NY 10013MDC FacilityPrisoner ID Number: 441-19-01080

ORIGINAL

FILED

IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

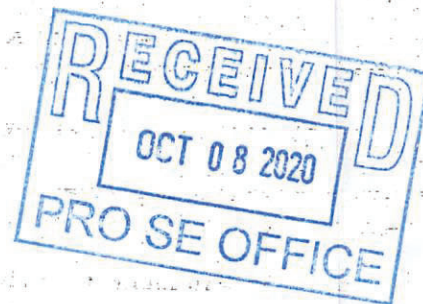
★ OCT 08 2020 ★

BROOKLYN OFFICE

CIVIL RIGHTS COMPLAINT

42 U.S.C. § 1983

JURY DEMAND

YES ☒ NO ☐

~~SECRET~~

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains. The concentration of the *Agrobacterium* suspension was 10<sup>6</sup> cells/ml (○), 10<sup>7</sup> cells/ml (□), 10<sup>8</sup> cells/ml (△), and 10<sup>9</sup> cells/ml (◇). The error bars represent the standard deviation of three independent experiments.

[illegible][illegible][illegible]

14-00000

[illegible]

1. *Phragmites australis* (Cav.) Trin. ex Steud.

• **Prevalence** – the proportion of the population with a disease at a particular point in time

*Journal of Management Studies*, 36(7), 809–826.

the 1990s, the number of people in the world who are under 15 years of age is expected to increase from 1.1 billion to 1.5 billion. The number of people aged 65 and over is expected to increase from 200 million to 400 million. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion. The number of people aged 15 and over is expected to increase from 3.5 billion to 4.5 billion.

[illegible][illegible]

CONFIDENTIAL

[illegible]

Ref: 100-443889

CONFIDENTIAL - SECURITY INFORMATION

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If you are not incarcerated, provide your current address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone Number: \_\_\_\_\_

**B. List all defendants.** You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

Sgt Matthew Gorman  
Full Name

Sgt NYPD  
Job Title

One Police Plaza

NY, NY 10038  
Address

Defendant No. 2

Noorallah Mashrie  
Full Name

Sgt NYPD  
Job Title

One Police Plaza

NY, NY 10038  
Address

Defendant No. 3

Jessica torrez  
Full Name

Officer NYPD  
Job Title

One Police Plaza



NY, NY 10038  
Address

Defendant No. 4

Daniel Oliver  
Full Name

Officer NYPD  
Job Title

One Police Plaza

NY, NY 10038  
Address

Defendant No. 5

Giuseppe Divanna  
Full Name

Officer NYPD  
Job Title

One Police Plaza

NY, NY 10038  
Address

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 1/2 by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? 120<sup>th</sup> St and Atlantic Avenue, Richmond Hill NY. At a T-Mobile store.

When did the events happen? (include approximate time and date)

The incident occurred on February 12<sup>th</sup> 2019  
between 6-7 PM.



## Facts

- 1 — on February 12, 2019 at approximately 6pm the plaintiff was located inside of a T-Mobile Store on 120<sup>th</sup> Street in richmondhill NY.
- 2 — on February 12, 2019 at approximately 6:15pm the Defendants Sgt Mathew Gorman, Sgt Naorallah Mashrie, OFFicer Jessica Tarrez, OFFicer Daniel Oliver, and OFFicer Giuseppe Divanna responded to the T-Mobile Store location because of a 911 call of a alleged robbery in Progress.

## Misuse of weapon; Negligence

- 3 — Shortly after these events the plaintiff attempted to open the entrance door to exit the T-Mobile store.
- 4 — Then as the plaintiff was attempting to exit, all Five Defendants opened Fire, letting OFF 42 rounds in 11 Seconds.
- 5 — The Plaintiff did not have a deadly weapon, nor did the plaintiff open or return Fire on anyone.
- 6 — out of the excessive 42 rounds of one sided Gun Fire by the Five Defendants, <sup>4</sup> The plaintiff was shot 8 times in the upper and lower body.
- 7 — The Defendants was still opening Fire on the defenseless plaintiff, even after the plaintiff was on the ground and no longer appearing to be deemed a threat.
- 8 — After Defendant Giuseppe Divanna OFFered life threatening aid to Plaintiff he was escorted to the new york Presbytirian Hospital in Queens NY to undergo the 1<sup>st</sup> of 12 Surgeries.
- 9 — As a result of the Defendants using excessive Force on the Plaintiff, each Defendant recieved administrative assignment and had their service weapons confiscated pending an internal Affairs Investigation.

10-

As a result OF the DEFendants Using excessive Force on the plaintiff the defendant's employer, the New York City Police Department had amended how they choose to train their Police Force through out the course OF each Year.

11- As a result OF the DEFendants using excessive Force on the plaintiff two OFFicers were also shot by the defendant's own friendly Fire. The Defendant Sgt Mathew Gorman was shot one time in the thigh and survived his wounds. Detective Brian Simonsen was struck in the chest and did not survive to his fatal mortal wounds.

## Cause of Action

- 12- The actions of Defendants Sgt Mathew Gorman, Sgt Nooralish Mashrie, Officer Jessica Torrez, Officer Daniel Oliver, and Officer Giuseppe Divanna in using excessive deadly force against the plaintiff without need or in failing to intervene to prevent misuse of force, were done maliciously and sadistically and constituted cruel and unusual punishment in violation of the eighth amendment rights of the United States Constitution.
- 13- The actions of all five defendants in using deadly physical force against the plaintiff without need constituted the tort of attempted murder, assault, and battery under the law of New York State.
- 14- The actions of all five defendants to negligently fire 42 rounds at a plaintiff who is not and is incapable of firing back is excessive and is deemed cruel and unusual punishment which is in violation of the eighth amendment of the United States Constitution.

## Relief requested

WHEREFORE, plaintiff requests that the court grant the following relief:

A. I issue a declaratory judgment stating that:

— The deadly physical force of the plaintiff by defendants violated the plaintiff's rights under the eighth Amendment to the United States Constitution and constituted an <sup>attempted murder</sup> assault and battery under state law.

B. Award compensatory damages in the following amounts:

16 — 100 million dollars jointly and severally against defendants Gorman, Mashrie, Torrez, Oliver, and Divanna, for the physical and emotional injuries sustained as a result of the plaintiff being shot

multiple times.

C Award Punitive damages in the Following amounts  
17- 20,000 each against defendants Gorman, Mashrie, Torrez,  
Oliver and Divanna

D Grant Such other relief as it may appear that plaintiff is entitled.

9/27/20

RespectFully Submitted

Plaintiff: Christopher Ransom

*Chris Ransom*

125 White Street

NY, NY 10013

Facts: (what happened?) (See attached)

**II.A. Injuries.** If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

I was shot in the chest, and lower body 8 times. I lost  
a testical, and have a permanent foot drop. I recieved 12  
surgeries in result of my sustained injuries.



III. **Relief:** State what relief you are seeking if you prevail on your complaint.

(see attached)

I declare under penalty of perjury that on 9/27/20, I delivered this  
(date)  
complaint to prison authorities at MDC to be mailed to the United  
(name of prison)  
States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 9/27/20

[Signature]  
Signature of Plaintiff

MDC  
Name of Prison Facility or Address if not incarcerated

125 white street

NY, NY 10013

Address

441-19-01080  
Prisoner ID#



Christopher Ransom  
125 White Street  
NY, NY 11213



Att: ~~Post~~<sup>SS</sup> Office  
United States district office  
eastern district of New York  
~~225~~<sup>225</sup> . Cadman Plaza East  
brooklyn NY 11201

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